



March 23, 2010

House Government Operations
Lansing, Michigan

Re: HB 4988 – Review of Administrative Rules

Dear Representatives,

The Michigan Environmental Council appreciates that when rules and regulations are poorly designed or written they can be burdensome on businesses and not achieve their intended purpose. However, well written ones reduce regulatory uncertainty and can provide valuable protection to vulnerable members of our population and fragile natural resources.

We fully support the legislature playing its role of government oversight to ensure government services are being implemented as efficiently as possible and state employees have the guidance and resources necessary to implement the laws and regulations that are on our books. We believe that when poorly designed or written laws are identified, that it is the proper role of the legislature to hold oversight hearing and determine whether regulations need to be updated or repealed.

However, we cannot support HB 4988. In these times of fiscal constraint, a wholesale review and analysis of all administrative rules on the books would be a waste of scarce state resources. Under the legislation, state agencies would have to do detailed analysis of every rule they administer, including a search of all federal and local regulations that may conflict with, or duplicate a state law or rule. This would be an expensive undertaking, diverting resources away from providing government services to Michigan residents.

We urge the committee to oppose the legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "James Clift".

James Clift
Policy Director

